

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

MEMPHIS CENTER FOR
REPRODUCTIVE HEALTH, et al.,

Plaintiffs,

v.

HERBERT H. SLATERY III, et al.,

Defendants.

CIVIL ACTION

CASE NO. 3:20-cv-00501

JUDGE CAMPBELL
MAGISTRATE JUDGE
FRENSLEY

MOTION FOR ADMISSION PRO HAC VICE

Pursuant to Rule 83.01(b) of the Local Rules of this Court, Stella Yarbrough, a member of the bar of this Court, hereby moves for the admission *pro hac vice* of Nicolas Kabat, an attorney at the Center for Reproductive Rights, 199 Water St., 22nd Floor, New York, NY 10038, 917-637-3600, nkabat@reprorights.org, for the purposes of this litigation in this Court as counsel for plaintiffs.

1. Nicolas Kabat does not reside in this district and does not maintain an office in this district for the practice of law.

2. Nicolas Kabat is a member in good standing of the bar of the State of New York (#5623111), the U.S. District Court for the Southern District of New York, and the U.S. District Court for the Eastern District of New York. A certificate of good standing from the U.S. District Court for the Southern District of New York and a sworn statement regarding disciplinary, contempt, and criminal proceedings are attached, and the filing fee in the amount of \$150.00 has been paid to the Clerk via the Court's electronic payment system.

Respectfully submitted,

/s/ Stella Yarbrough

Stella Yarbrough, BPR No. 033637

ACLU Foundation of

Tennessee

P.O. Box 120160

Nashville, TN 37212

Tel.: 615-320-7142

syarbrough@aclu-tn.org

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DECLARATION OF NICOLAS KABAT

1. I hereby certify that I am a member in good standing of the United States District Court for the Southern District of New York. A true and correct copy of my Certificate of Good Standing is included with the motion for my admission *pro hac vice*.
2. I also declare under penalty of perjury that I am not, nor have I ever been, the subject of criminal proceedings nor disciplinary proceedings by any disciplinary authority, nor have I had a finding of contempt or a sanction against me under 28 U.S.C. § 1927.

/s/ Nicolas Kabat

Nicolas Kabat
Center for Reproductive Rights
199 Water St., 22nd Floor
New York, NY 10038
Phone: 917-637-3600
nkabat@reprorights.org

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a true and correct copy of the foregoing has been served by e-mail according to instructions from the Attorney General's Office to tnattygen@ag.tn.gov and by U.S. Mail on the following on the 29th day of June, 2022:

Herbert H. Slatery III
Attorney General for the State of Tennessee
Office of the Attorney General and Reporter
P.O. Box 20207
Nashville, TN 37202-0207

Lisa Piercey, M.D.
Commissioner of the Tennessee Department of Health
710 James Robertson Parkway
Nashville, TN 37243

Rene Saunders, M.D.
Chair of the Board for Licensing Health Care Facilities
665 Mainstream Drive, 2nd floor
Nashville, TN 37243

Melanie Blake, M.D.
President of the Tennessee Board of Medical Examiners
665 Mainstream Drive, 2nd Floor
Nashville, TN 37243

Amy P Weirich
District Attorney General of Shelby County, Tennessee
201 Poplar Ave., Suite 301
Memphis, TN 38103

Glenn Funk
District Attorney General of Davidson County, Tennessee
222 2nd Ave N #500
Nashville, TN 37201

Charme P. Allen
District Attorney General of Knox County, Tennessee
City County Building 400 Main Street
Suite 168
Knoxville, TN 37902

Jason Lawson
District Attorney General for Wilson County, Tennessee
119 South College St.
Lebanon, TN 37087

/s/Stella Yarbrough
Stella Yarbrough